

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

JASON WILLIAMS,

Plaintiff,

vs.

AT&T MOBILITY LLC,

Defendant.

Case No. 5:19-cv-00475-BO

**JOINT MOTION FOR ENTRY OF
RULE 502(d) ORDER**

Plaintiff Jason Williams and Defendant AT&T Mobility LLC, (“the Parties”) jointly and through their respective undersigned counsel, hereby respectfully request that the Court enter the proposed Order Governing Disclosure of Documents Pursuant to Federal Rule of Evidence 502(d) submitted with this Motion (the “Proposed Rule 502(d) Order”).

In support of this Motion, the Parties show the Court that:

1. The Parties agreed at the Rule 26(f) Discovery Planning Conference that the inadvertent production of privileged information should not waive or otherwise compromise any applicable privilege or preclude the party from asserting privilege claims after production;
2. The Parties thereafter agreed to the terms of the Proposed Rule 502(d) Order; and
3. Entry of the Proposed Rule 502(d) Order is likely to assist with discovery in this matter.

WHEREFORE, the Parties request that the Court consider and enter the Proposed Rule 502(d) Order and grant such other and further related relief as it deems appropriate.

Respectfully submitted this 12th day of May, 2020.

For Plaintiff:

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Counsel for Defendant AT&T Mobility LLC

CERTIFICATE OF SERVICE

I hereby certify that on date set out below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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This the 12th day of May, 2020.

/s/ Joseph Dowdy

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